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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA
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16 AYANA STEVENSON,
DAVID AMBROSE and
17 LISA RAMIREZ,
For Themselves,
18 As Private Attorneys General, and
On Behalf Of All Others Similarly Situated,
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20 Plaintiffs,
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22 v.

23 SIRIUS XM RADIO INC.,
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25 Defendant.
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Case No. 23-cv-02367-WHO

**STIPULATION AND [PROPOSED]
ORDER FOR ENLARGEMENT OF
BRIEFING SCHEDULE RE:
DEFENDANT'S RESPONSE TO FIRST
AMENDED COMPLAINT**

STIPULATION

WHEREAS, on June 20, 2023, Plaintiffs Ayana Stevenson, David Ambrose and Lisa Ramirez (collectively, “Plaintiffs”) filed and served in this civil action their operative First Amended Complaint (Dkt. 11) (*See* Declaration of Paul Karl Lukacs, ¶ 2 (filed simultaneously herewith));

WHEREAS, pursuant to the Joint Stipulation And Order For Enlargement Of Time To File Amended Complaint And Response To The Complaint filed on May 24, 2023 (Dkt. 6)—which is the only previous time modification in this civil action—the response of Defendant Sirius XM Radio Inc. (“SiriusXM”) is due to be filed and served on or by July 17, 2023 (Lukacs Decl., ¶ 3);

WHEREAS, Plaintiffs’ Opposition to SiriusXM’s response would ordinarily be due on or by July 31, 2023, pursuant to Civil L.R. 7-3(a), and SiriusXM’s reply in support of its response would ordinarily be due on or by August 7, 2023, pursuant to Civil L.R. 7-3(c) (Lukacs Decl., ¶ 4);

WHEREAS, Plaintiffs’ counsel respectfully requests additional time to complete the opposition to SiriusXM’s response due to a multi-joint inflammation attack that is attacking Plaintiffs’ counsel’s right hand and right shoulder, significantly slowing the speed at which he (who is right-handed) can write and edit legal documents in this civil action and in the other pieces of litigation on which he is currently working and is scheduled to work on this summer (Lukacs Decl., ¶ 5);

WHEREAS, Plaintiffs propose and SiriusXM concurs that the deadline for Plaintiffs to file their opposition be enlarged by two weeks and that, as a reciprocal professional courtesies, the deadline for SiriusXM to file its reply be enlarged by one week (Lukacs Decl., ¶ 6);

WHEREAS, this Court possesses, pursuant to Civil L.R. 6-1(b), the authority to enlarge the time in which SiriusXM’s response is briefed;

NOW, THEREFORE, Plaintiffs and SiriusXM STIPULATE and AGREE, pursuant to Civil L.R. 6-2 and 7-12, that the Court should enter an Order directing that:

1 1. Plaintiffs' opposition to SiriusXM's response to the First Amended Complaint
2 should be due to be filed and served on or by August 14, 2023;

3 2. SiriusXM's reply should be due to be filed and served on or by August 28, 2023;
4 and

5 3. The hearing on SiriusXM's response to the First Amended Complaint should be
6 held by this Court at 2:00 p.m. on Wednesday, September 27, 2023, via Zoom.

7 DATED: July 12, 2022

8 HATTIS & LUKACS

JONES DAY

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*Attorneys for Defendant
Sirius XM Radio Inc.*

*Attorneys for Plaintiff
and the Proposed Class and Subclasses*

17 **ORDER**

18 IT IS SO ORDERED.

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21 Date: July ___, 2023

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HON. WILLIAM H. ORRICK
23 Judge of the U.S. District Court
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